

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Holt, et al. v. National Football  
League, et al.

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF  
ROBERT JACKSON, JR.**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Robert Jackson, Jr. only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Robert Jackson, Jr.

2. Plaintiffs' counsel filed a short form complaint for Robert Jackson, Jr. on August 9, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Robert Jackson, Jr. and the undersigned.

4. Plaintiffs' counsel properly notified Robert Jackson, Jr. of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Robert Jackson, Jr. only in Court File No. 2:12-cv-4185-AB.

Dated: March 10, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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